

# COLELLA | ZEFUTIE LLC

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*Via ECF*

April 21, 2025

Naomi Reice Buchwald, U.S.D.J.  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: Tatum v. Sensio, Inc.**  
**Case No. 1:23-cv-4240 (NRB)**

Dear Judge Buchwald:

Further to our teleconference with the Court on April 17, 2025, the parties respectfully submit for the Court's consideration the following schedule and case management plan for completing discovery in the above-referenced matter.

<u>Fact discovery end date:</u>	June 15, 2025
<u>Completion of IMEs:</u>	June 30, 2025
<u>Affirmative Expert Reports:</u>	July 15, 2025
<u>Responding Expert Reports:</u>	August 15, 2025
<u>Discovery end date:</u>	September 15, 2025

*So Indured.  
Naomi Reice  
Buchwald, USJD  
4/22/25*

The parties understand that this is a generous schedule, but as we advised the Court on April 17, Defendant has invested significant time in reviewing and producing documents since entering its appearance in this case. Now that those documents have been produced, and the parties intend to work proactively through any discovery disputes without burdening the Court. In addition, Plaintiff's counsel is handling roughly 14 other similar cases involving similar pressure cookers, which is why the IME in this matter has been scheduled for mid-June—the earliest available time for Defendant's expert given the number of cases pending.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

JOHNSON BECKER PLLC

s/ Adam J. Kress

Adam J. Kress (*admitted pro hac vice*)  
Attorneys for Plaintiff  
Justin Douglas

COLELLA ZEFUTIE LLC

s/ John J. Zefutie, Jr.

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Sensio, Inc.